



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 12, 2008

Anna Burger, Treasurer
Service Employees International Union Committee
on Political Education (SEIU COPE)
1800 Massachusetts Ave NW
Washington, DC 20036

Response Due Date:
October 14, 2008

Identification Number: C00004036

Reference: June Monthly Report (5/1/08-5/31/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 items:

1. The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.
2. Schedule E of your report indicates that your committee may have failed to file one or more of the required 24 hour notices regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The notice must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and

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reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)

3. Your committee has filed a 24 hour notice for an independent expenditure supporting Gary Connelly (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 24 hour notices must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction.

4. Schedule B discloses an expenditure(s) for "salary and relateds for canvass workers," and "phone banking." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather

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than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,



Rosa G. Lewis
Senior Campaign Finance Analyst
Reports Analysis Division

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Missing 24 Hour Notice

Name of Payee	Date	Amount	Purpose	Candidate
M & R Strategic Services	5/29/08	\$12,500	Printing and Mailing	Barack Obama

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24 / 48 HOUR NOTICE OF INDEPENDENT / COORDINATED EXPENDITURE, on : 06/01/2008
 SERVICE EMPLOYEES INTERNATIONAL UNION COMMITTEE ON POLITICAL EDUCATION (SEIU COPE)
 1800 Massachusetts Ave NW
 Washington DC 20036
 06/01/2008 18 : 50

Washington
 FEC ID No. C00004036

DC 20036

X 24-Hour Notice 48-Hour Notice

SCHEDULE E (FEC Form 3X)
 ITEMIZED INDEPENDENT EXPENDITURES

PAGE OF 1/1

FOR LINE 24 OF FORM 3X

FEC IDENTIFICATION NUMBER

C C00004036

NAME OF COMMITTEE (in Full)

SERVICE EMPLOYEES INTERNATIONAL UNION COMMITTEE ON
 POLITICAL EDUCATION (SEIU COPE)

Check if X 24-hour notice 48-hour notice

Full Name (Last, First, Middle, Initial) of Payee

SEIU Communications Center Inc

Date

05 31 2008

Amount

14856.75

Mailing Address

330 W 42nd St

City

New York

State

NY

Zip Code

10036

Purpose of Expenditure

Phonebank starting
 5/31

Category/
 Type 007

Office Sought: X House State: VA
 Senate District: 11
 Presidential

Name of Federal Candidate supported or Opposed by expenditure:

Gary Connelly

Check One: X Support Oppose

Disbursement For: X Primary General 2008

Other (specify):

Transaction ID: SE000001

Calendar Year-To-Date Per Election

14856.75

for Office Sought

(a) SUBTOTAL of Itemized Independent Expenditures

14856.75

(b) SUBTOTAL of Unitemized Independent Expenditures

(c) TOTAL Independent Expenditure

14856.75

Under penalty of perjury, I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Anna Burger

Signature

06 01 2008

FEC Form 3X Form 24 (Schedule E) 06/01/08

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[REDACTED]